



May 10, 2005

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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

Re: Extension on the 60-day comment period for: Mangos, Persian (Tahiti) Limes and Leaf Lettuce (Field Grown)

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

NAPAR has appreciated the opportunity to assist USDA in its review of the U.S. Grade Standards for all fresh fruit and vegetable agricultural commodities. In doing so, we have attempted to provide thoughtful and accurate information representing our members' views. Recently, however, we have found it increasingly difficult to gather the volume of information necessary to draft meaningful comments within the allotted time frame.

While some organizations represent narrow constituencies focusing on single or related commodities, our members are typically full-line receivers, handling wide varieties of produce items. This means that NAPAR, in order to adequately represent the needs of its members, has to become actively involved in as many potential grade changes as possible. This, as you might assume, is a time-consuming process requiring surveys of the membership on every item under review.

Until recently, the Notices from AMS through the Federal Register were distributed fairly evenly and could be handled within a reasonable time. Lately, however, several Notices, issued by AMS through the Federal Register, specifically the ones issued on March 11, 2005, March 24, 2005 and March 29, 2005 concerning: Docket Numbers FV-04-304 (Mangos), FV-04-308 (Sweet Peppers), FV-04-309 (Limes), FV-04-311 (Kale), FV-05-301 (Strawberries), FV-05-302 (Snap Beans), FV-04-303 (Leaf Lettuce) and FV-05-304 (Asparagus), require due dates for public comment that are in extremely close proximity to one another. In fact, six of them are all due on May 10, 2005, while others are due on May 23, 2005 and May 31, 2005. This places a tremendous hardship on an organization like NAPAR to file comprehensive comments within the allotted time. We have, however, filed comments today on Sweet Peppers, Kale, Strawberries and Snap Beans.

As a result, NAPAR respectfully requests that an extension of sixty (60) days be granted for the official comment period on Mangos, Persian (Tahiti) Limes and Leaf Lettuce (Field Grown) so that we may

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more completely and accurately accommodate your informational needs. We appreciate being included in this process and hope our efforts will contribute to an improved system of grade standards.

We hope you find our request reasonable and appreciate your consideration of it.

Sincerely,

Patrick A. Davis